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10 *Attorneys for Plaintiff James Karon*
11 *Derivatively on behalf of Facebook, Inc.*
12 *In Karon v. Facebook*
No 5:18-CV-01929 (N.D. Cal.)

13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15
16 LAUREN PRICE, individually and on behalf
17 of all others similarly situated,

18 Plaintiff,

19 vs.
20

21 FACEBOOK, INC., and CAMBRIDGE
22 ANALYTICA,

23 Defendants.
24
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Case No. 3: 18-CV-1732-VC

**PLAINTIFF JAMES KARON'S
RESPONSE TO
ADMINISTRATIVE MOTION
TO CONSIDER WHETHER
CASES SHOULD BE RELATED**

[CIVIL L.R. 3-12 AND 7-11]

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Rule 3-12(b) and Rule 7-11 of the Civil Local Rules, plaintiff James Karon who filed a shareholder derivative actions on behalf of Facebook, Inc.

("Facebook") hereby respectfully submits the response in support of Plaintiff Natalie Ocedgueda's Administrative Motion To Consider Whether Cases Should Be Related.

Plaintiff Karon had previously asked the Court to consider whether the *Karon* action is related to four other Facebook derivative cases in this District, *Hallisey v. Zuckerberg*, 18-cv-1792-HSG (the "*Hallisey Action*"); *Martin v. Zuckerberg*, 18-cv-1834-DMR (the "*Martin Action*"); *Ocegueda v. Zuckerberg*, 18-cv-1893-KAW (the "*Ocegueda Action*"); *Stricklin Trust v. Zuckerberg*, 18-cv-2011-JSC (the "*Stricklin Action*").

However, upon review of the new consumer class actions regarding Facebook, Plaintiff Karon agrees that it would serve the interests of the Court and the parties to have all of the actions related and assigned to one Court to reduce the costs of discovery and limit motion practice. Therefore, Plaintiff Karon requests that his action be related to the above cases as well as the following consumer actions: *Rubin v. Facebook, Inc.*, 18-cv-1852-VC; *Gennock v. Facebook*, 18-cv-1891-VC; *Beiner v. Facebook*, 18-1953 – VC; *O'Kelly v. Facebook*, 18-cv-1915-VC; *Haslinger v. Facebook*, 18-cv-1984-VC. All of these consumer cases have been related and assigned to Hon. Vince Chhabria (San Francisco).

Accordingly, Plaintiff asks the Court to grant the administrative motion and issue an Order that all the Facebook cases are related and are assigned to Judge Chhabria.

DEREK G. HOWARD LAW FIRM, INC.

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By: /s/ Daniel J. Mulligan